

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

DALE A. GUILFOIL,

Plaintiff

v.

DAVID PIERCE, et,al.,

Defendant

FILED

11/12 15 2007

U.S. DISTRICT COURT
DELAWARE

C.A. No. 06-493-GMS

JURY TRIAL REQUESTED

PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS AND REQUEST FOR INSPECTION

Pursuant to Rules 26 and 34 of the Federal Rules of civil procedure, plaintiff hereby serve on Defendants, David Pierce et,al., the following Request for Production of Documents and Inspection, measuring and photographing of living quarters.

REQUEST FOR PRODUCTION

Request No. 1:

D. Any and all medical records of plaintiff from the time of his incarceration in the Delaware Correctional Center through and including to the date of his transfer to the Central Violation of Probation Center in August of 2006.

REQUEST No. 2:

2). List of names of the inmates transferred into and out of the housing area known as W-Building, Tier-B, Cell 4, along with bunk assignments, for the months of February 2006 thru August 2006.

REQUEST FOR MEASURING AND PHOTOGRAPHING

REQUEST NO. 3;

3. Plaintiff request to enter the unit known as W+ Building at the Delaware Correctional Center to measure and photograph the bunk and cell areas of B-Tier.

Dale Guilford

Dale Guilford #166308
Sussex Correctional Center
Post Office Box 500
Georgetown, DE 19974

Date: August 12, 2007

CERTIFICATE OF SERVICE

I Dale Guifford, certify that on August 12, 2007 I have mailed a copy of the foregoing motion for Request for Production of Documents and Request for Inspection, to Eileen Kelly (I.O.2884) Attorney for Defendants at 820 N. French St 6th Floor, Wilmington, De 19801

Dale Guifford
Dale Guifford #166308
Sussex Correctional Center
Post Office Box 500
Georgetown, De 19947

Date: August 12, 2007

I/M: Dale Guiford BLDG: 1010 South
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500 ¹⁶⁶³⁰⁸
GEORGETOWN, DELAWARE 19947

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